

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN**

HEATHER NELSON,

Plaintiff,

v.

Case No.: 11-cv-307

**SANTANDER CONSUMER USA, INC.,
PATRICK K. WILLIS CO., INC.,
d/b/a AMERICAN RECOVERY SERVICE,
ASSETSBIZ CORP. d/b/a ABC RECOVERY,**

Hon. Barbara B. Crabb

Defendants.

**DEFENDANT SANTANDER CONSUMER USA, INC.'S MOTION
TO STRIKE PLAINTIFF'S ADDITIONAL PROPOSED FINDINGS OF FACT ON
REPLY AND CORRESPONDING PORTIONS OF REPLY BRIEF**

Defendant Santander Consumer USA, Inc., through its attorneys, Reed Smith LLP, hereby moves this Court to strike Plaintiff's additional proposed findings of fact submitted on reply and the corresponding portions of Plaintiff's summary judgment reply brief for the reasons set forth in its Memorandum hereby submitted in support of the motion.

DATED: February 27, 2013

Respectfully submitted,

SANTANDER CONSUMER USA,
Defendant

/s/ Gary S. Caplan

One of Its Attorneys

Gary S. Caplan (IL ARDC No. 6198263)
David Z. Smith (IL ARDC No. 6256687)
Reed Smith LLP
10 South Wacker Drive
Chicago, Illinois 60606-7507
312.207.1000
gcaplan@reedsmith.com

CERTIFICATE OF SERVICE

I, Gary S. Caplan, hereby state that on February 27, 2013, I electronically filed the foregoing **DEFENDANT SANTANDER CONSUMER USA, INC.'S MOTION TO STRIKE PLAINTIFF'S ADDITIONAL PROPOSED FINDINGS OF FACT ON REPLY AND CORRESPONDING PORTIONS OF REPLY BRIEF** with the Clerk of the U.S. District Court for the Western District of Wisconsin using the ECF system, which will send notification to all parties of record.

By: /s/ Gary S. Caplan
Gary S. Caplan (IL ARDC No. 6198263)
REED SMITH LLP
10 South Wacker Drive
Chicago, Illinois 60606
(312) 207-1000

US_ACTIVE-112107529